

# EXHIBIT 3

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**From:** Chris Roussos <chris.roussos@sequelyouthservices.com>  
**Date:** Monday, January 27, 2020 at 4:25 AM  
**To:** PAKSERESHT Fariborz <FARIBORZ.PAKSERESHT@dhsola.state.or.us>  
**Cc:** Sen Gelser <Sen.SaraGelser@oregonlegislature.gov>  
**Subject:** Re: TCI Training

Agree, look forward to debriefing today. As you recall from our conversation last night, I did say we have 21 trainers now at NIA, I also said I did not know what they were certified in. The point I was making is that we continue to make investments in NIA and the company.

**Chris Roussos** | *Chief Executive Officer*



**c:** [479.769.0103](tel:479.769.0103)

**e:** [chris.roussos@sequelyouthservices.com](mailto:chris.roussos@sequelyouthservices.com)  
[sequelyouthservices.com](http://sequelyouthservices.com)

**Join Our Team!**

On Jan 27, 2020, at 7:13 AM, PAKSERESHT Fariborz  
<FARIBORZ.PAKSERESHT@dhsola.state.or.us> wrote:

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Thank you, Senator Gelser, for this detailed information. I look forward to learning more at our debrief about NIA/CMS today.

Fariborz

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**From:** Sen Gelser <Sen.SaraGelser@oregonlegislature.gov>  
**Sent:** Sunday, January 26, 2020 9:06 PM  
**To:** Chris Roussos <chris.roussos@sequelyouthservices.com>  
**Cc:** PAKSERESHT Fariborz <FARIBORZ.PAKSERESHT@dhsosha.state.or.us>  
**Subject:** TCI Training

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Hi Chris and Fariborz,

Thanks for the ongoing discussion. In the lobby, we were discussing TCI training and you indicated that NIA has told you they now have 21(?) certified trainers on staff at the facility. I referenced some information that I wanted to send to you to assist in the further discussion tomorrow.

According to the materials submitted to Oregon, and the references in the survey documents provided by CMS, TCI is the crisis intervention program used by NIA. As of November 11, 2019 TCI (through Cornell) only had a record of one person certified to train staff at NIA—her name was Emily Kightly. However, her name is not on the staff list provided to Oregon DHS staff last fall. They had records of two other NIA staff with recently expired certifications, but those names were also not on the list (Molly Managhan and Edward Lynch)

Although NIA told DHS that the onsite QA manager was a TCI certified trainer, Cornell stated that her certification expired about 5 years ago.

Many residential programs do keep their own certified trainers on staff in order to train their residential program staff. In order to be certified to teach TCI, the individual must attend a "Train the Trainers" training. It lasts for 5 full days at a cost of about \$2500 per person. Before a person can attend the train the trainer session, they must have completed 28 hours of basic TCI training to become certified in the technique. Each Train the Trainer session is limited to about 20 participants, and the trainers are required to attend Cornell sponsored training updates every 2 years. [https://rccp.cornell.edu/tci/tci-1\\_txt.html](https://rccp.cornell.edu/tci/tci-1_txt.html) and [https://rccp.cornell.edu/tci/tci-2\\_certif\\_assoc.html](https://rccp.cornell.edu/tci/tci-2_certif_assoc.html)

Between November 11, 2019 and the present there has only been one Train the Trainer course which was held from December 9-13, 2019 in Ithaca, New York. [https://rccp.cornell.edu/tci/tci-2\\_schedule\\_US.html](https://rccp.cornell.edu/tci/tci-2_schedule_US.html)

For your reference, here are the written answers I received to questions that I asked of Cornell. The responses were written by the program directors, Martha Holden and Andrea Turnbull and were written and received on November 11, 2019. My questions are in green and the responses are in blue.

According to your records, are there certified TCI trainers employed by Sequel? If so, how many and at which locations?

We maintain the certification information of TCI trainers in a central database. We have them organized by organization. With Sequel being a "parent" company, we would need to know the organization's name to be able to verify if they have TCI Trainers. Here is the information for agencies that you identified:

Northern IL Academy

Edward Lynch expired 9/28/2019

Molly Monaghan expired 3/16/2019

Emily Kightly currently certified through 4/12/2020

Clarinda Academy

No trainers

STARR Albion Commonwealth

No current trainers. The most recent expired in 2013

Woodward Academy

No trainers past or present

Lakeside

No current trainers. The most recent expired in 2007

- What are the dates of your most recent trainings?

We provide train-the-trainer courses around the country on a monthly basis. These can be found on our website at <http://rccp.cornell.edu>

There are courses for initial certification (5 days) and also trainer re-certification courses. Trainers seeking re-certification at their 2 year and 4 year mark must attend re-certification courses which are 2 days. Those who have been trainers for 6 years or more are eligible for re-certification topics which are presented in 1 day. Trainers are tested in the TCI knowledge through a written test and each trainer must demonstrate competency in the physical restraint portion according to their current certification.

- Based on incident reports and photographs, some of the individuals involved in supine restraints of young children are very large people. Is this permitted in TCI?

The supine restraints are designed for adolescents and not young children. There are two techniques for smaller children that avoids placing them in a prone or supine position on the floor. One is the small child restraint and the other is the seated restraint. TCI provides guidance to trainers who are applying for certification around body mass index and physical ability. There is also guidance around what restraint is appropriate based on the size of the child in relation to the size of the staff.

- Does TCI keep a record of those who are certified to practice TCI? We maintain records on those individuals who are certified as trainers. The design of the TCI system is for agency trainers to certify and track their own staff internally. We do not maintain any records of the staff trained at the agency level.

Senator Sara Gelser  
Chair, Senate Human Services Committee  
[Sen.saragelser@oregonlegislature.gov](mailto:Sen.saragelser@oregonlegislature.gov)  
(503) 986-1708\* 900 Court Street NE, Salem, OR 97301  
Pronouns: She/Her/Hers

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